



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

CIVIL RIGHTS BUREAU
212.416.8637

June 1, 2022

By ECF

Honorable Victor Marrero
United States District Court
Southern District of New York

**Re: *National Coalition on Black Civic Participation v. Jacob Wohl*,
SDNY Case No. 20 Civ. 8668 (VM)(OTW)**

Dear Judge Marrero:

On behalf of all Plaintiffs and Defendants Robert Mahanian and Message Communications, Plaintiff-Intervenor the People of the State of New York hereby respectfully submits for so-ordering a fully executed proposed Consent Decree, settling the claims against Robert Mahanian and Message Communications only.¹

The parties are prepared to respond to any questions or concerns the Court may have.

Respectfully,

/s/ Rick Sawyer

Rick Sawyer
Special Counsel
New York State
Office of the Attorney General

Encl.

cc: All counsel of record (via ECF)

¹ The Court's May 9, 2022 Order of Conditional Discontinuance mentions only Defendant Message Communications. *See* D.E. 194. The parties respectfully clarify that the attached consent Decree covers claims against *both* Message Communications and Robert Mahanian.